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February 15, 2018

Hon. Robert M. Levy
U.S. District Court
225 Cadman Plaza East
Brooklyn, NY 11201

RE: RIVERA et al v. FINANCIAL ASSET MANAGEMENT SYSTEMS, INC.
17-CV-1295

Dear Judge Levy:

This letter is written to request additional time to file the joint letter regarding discovery disputes that is scheduled for submission to the Court by February 20, 2018. In addition, this letter is written to request that the next conference, scheduled for March 1, 2018, be rescheduled accordingly.

The parties conducted a lengthy meet-and-confer on February 13, 2018 and some progress was made regarding numerous discovery disputes. The parties are still attempting to resolve additional disputes, but we don't anticipate resolving all disputes. We do feel that an additional week's time to submit the joint letter to the Court would be beneficial and would give the parties additional time to limit the number of discovery disputes that will be brought to the Court's attention. The parties are requesting a date of February 27, 2018 to submit the joint letter to the Court.

Since February 27, 2018 is just two days before the next scheduled Court conference, the parties are suggesting that the Court may wish to adjourn that Court conference to a later date. The parties suggest March 13th or the afternoon of March 14th for the telephone conference to address the remaining discovery disputes.

This application is made with consent of plaintiff's counsel.



Hon. Robert M. Levy
February 14, 2018

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Thank you for your consideration.

Sincerely,

BARRON & NEWBURGER, P.C.

Arthur Sanders

as/mtf